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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

JUAN QUINTANILLA VASQUEZ,
GABRIELA PERDOMO ORTIZ, and
VICTOR HUGO CATALAN MOLINA,
individually and on behalf of all others
similarly situated,

PLAINTIFFS,

vs.

LIBRE BY NEXUS, INC. and JOHN DOES
1- 50,

DEFENDANTS.

) Case No. 4:17-cv-00755

) **Motion to Issue Exemplification Certificates**

) Hon. Claudia Wilken

1 Plaintiffs Juan Quintanilla Vasquez, Gabriela Perdomo Ortiz, Victor Hugo Catalan Molina,
2 and Kevin Calderon (“Plaintiffs”), by and through their counsel, will, and hereby do, respectfully
3 move for the issuance of an Exemplification Certificate for the Judgments as Modified (Docket Nos.
4 249 & 250) issued by this Court on February 2, 2023 (the “Judgments”).¹

5
6 Plaintiffs seek the issuance of an exemplification certificate as doing so will facilitate the
7 collection of the sums due under the parties’ settlement agreement as well as those costs and penalties
8 laid out in the Judgments. Despite repeated efforts by the Plaintiffs, Defendants have still failed to
9 pay any of the sums due. Effective and efficient collection efforts are therefore necessary for
10 Plaintiffs to recover any of the funds to which they are entitled.

11
12 To this end, Plaintiffs respectfully that the Court grant Plaintiffs’ motion and furnish Plaintiffs
13 with exemplification certificates.

14
15 December 14, 2023

16
17 Respectfully submitted,

18 MIGLICACCIO & RATHOD LLP

19 By: /s/ Jason S. Rathod

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¹ The proposed exemplification certificate is attached hereto.

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